



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

### West Central Regional Office

W. Tayloe Murphy, Jr.  
Secretary of Natural Resources

3019 Peters Creek Road, Roanoke, Virginia 24019  
Telephone (540) 562-6700, Fax (540) 562-6725  
www.deq.state.va.us

Robert G. Burnley  
Director

Richard F. Weeks, Jr.  
Regional Director

July 2, 2002

Mr. Rich Stewart  
Rotometrics  
225 Jeb Stuart Highway  
Meadows of Dan VA 24120

RE: RCRA Compliance Evaluation Inspection (CEI) held on June 6, 2002  
Rotometrics; 225 Jeb Stuart Highway; Meadows of Dan, VA 24120  
EPA ID # VA075612564

*WAD*

Dear Rich:

A RCRA Compliance Evaluation Inspection (CEI) was conducted at your facility by the Department of Environmental Quality's (DEQ) West Central Regional Office. Your facility was inspected as a large quantity generator (LQG) hazardous wastes. Copies of relevant checklists completed for this inspection are enclosed.

Based on review of observations, responses, and documents obtained during this inspection, the above referenced facility appears to be in compliance with the Virginia Waste Management Act (1950 Code of Virginia, as amended, §§ 10.1-1400, et seq.), and the Virginia Hazardous Waste Management Regulations (VHWMR).

Thank you for your cooperation during the inspection. The Department appreciates your efforts and communications regarding proper waste management. If you have any questions or need any additional information, please do not hesitate to call me at (540) 562-6819.

Sincerely,

*Kimberly Thompson*

Kimberly Thompson  
Environmental Specialist II

Enclosures

C: Dan Gwinner, DEQ-OTA  
DEQ-WCRO HW Files

# DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE DIVISION

## SURVEY SHEET FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: **ROTOMETRICS**

ADDRESS: **225 JEB STUART HIGHWAY; MEADOWS OF DAN, VA 24120**

EPA ID NUMBER: **VAD075612564**

FACILITY REPRESENTATIVE: **MR. RICH STEWART, SUPERVISOR**

TELEPHONE NUMBER: **276-952-2026 FAX: 276-952-2269**

INSPECTOR'S NAME/TITLE: **KIMBERLY THOMPSON, ENVIRONMENTAL SPECIALIST II**

DATE of INSPECTION: **JUNE 6, 2002**

1. WHAT IS THE BUSINESS ACTIVITY OF THE FIRM? (i.e., furniture mfg., metal plating, recycling, etc.)

*Manufacturing of dies and tools for the paper cutting industry*

2. GIVE A BRIEF DESCRIPTION OF THE WASTE STREAM(S) BY CHEMICAL NAME, IF POSSIBLE AND HAZARDOUS WASTE CODE(S) GENERATED BY THE FIRM. \*Based upon 1991 Biennial Report\*

D002 F006 D007: *spent corrosive liquid from etch process [hydrochloric acid]*  
 F006: *spent rinse waters and solids from etch process [ferric chloride, chromium, cadmium]*  
 D004 D007 D008: *spent liquid and debris from chromium plating process [potassium hydroxide, chromium, lead, arsenic]*  
 D001 D011: *spent flammable liquid from film process [silver]*  
 F006: *spent filters and liquid from air pollution control equipment [chromium]*  
 F006 D007: *spent de-ionizer pellets from chrome plating process [chromium]*  
 D011: *spent toxic liquid from photo lab [thisulfuric acid, silver]*

*Non-hazardous wastes generated: Used oil and filters, used antifreeze, scrap metal, wastewater from evaporators, oily sludge, adsorbants*  
*Universal wastes generated: mercury fluorescent lights; used batteries*

3. LIST (A) THE NOMINAL AMOUNTS OF HAZARDOUS WASTE GENERATED IN ANY MONTH, AND (B) THE GREATEST AMOUNTS OF ALL WASTES EVER ACCUMULATED/GENERATED AT THE SITE, IF APPLICABLE TO THE GENERATOR CATEGORY DETERMINATION (I.E.; IF A CESQG, HAVE THEY EVER GENERATED 1000 KG ACCUMULATION, OR IF A SQG, HAVE THEY EVER EXCEEDED 1000 KG/MO GENERATION FOR ALL WASTE STREAMS AGGREGATE).

A) WASTE CODES AMOUNT GENERATED  
*Facility is definitely a large quantity generator - see below for highest amount accumulated*

B) MAXIMUM WASTE GENERATION AND/OR ACCUMULATION (List quantities, types, and relevant dates)

D002 [hydrochloric acid]]	2500 gal	[March 02]
F006 [liquids]	1368 #	[Jan 02]
F006 [rags & solids]	300 #	[March 02]
D011 [silver]	350 #	[March 02]
D004 D007 D008 [chrome plating]	165 gal	[June 01]]

8. DOES THE FACILITY GENERATE ANY HAZARDOUS WASTE THAT IS RECLAIMED TO RECOVER ECONOMICALLY FEASIBLE AMOUNTS OF GOLD, SILVER, PLATINUM, PALLADIUM, IRIIDIUM, OSMIUM, RHODIUM, RUTHENIUM, OR ANY COMBINATION OF THESE? IF YES, LIST THE WASTE AND WHERE IT IS SENT. VERIFY COMPLIANCE WITH PART 266 SUBPART F AND PROVIDE COMMENT. \*Silver bearing wastes are taken to permitted TSD for disposal \* YES NO

9. DOES FACILITY GENERATE, TRANSPORT, STORE, COLLECT OR RECLAIM SPENT LEAD-ACID BATTERIES? YES NO  
IF YES, CIRCLE ALL THAT ARE APPLICABLE.

GENERATE	<u>X</u>
TRANSPORT	<u>X</u>
STORE	_____
COLLECT	_____
RECLAIM	_____

[FACILITIES STORING LEAD-ACID BATTERIES AND RECLAIMING THEM ON-SITE ARE SUBJECT TO PART B REQUIREMENTS]. SPECIFY MANAGEMENT METHOD(S):

*Facility generates batteries that are managed under universal waste regulations. Lead acid batteries are transported to a drop-off site in Hillsville VA. NiCads and fluorescent light bulbs are taken by Southeastern Tech Recyclers.*

10. BASED ON THE ABOVE PRELIMINARY INFORMATION THE FACILITY IS CONSIDERED TO BE ACTING AS, AND IS BEING EVALUATED FOR THIS INSPECTION AS, A [UNDERLINE OR CIRCLE ALL APPLICABLE]:

- A. CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR
- B. SMALL QUANTITY GENERATOR
- C. **GENERATOR**
- D. PERMITTED OR INTERIM STATUS TSD
- E. UNPERMITTED TSD (EXPLAIN IN COMMENTS SECTION)
- F. TRANSPORTER
- G. OTHER: PLEASE EXPLAIN IN COMMENTS SECTION BELOW.

(IF EPISODIC GENERATION HAS OCCURRED, YOU WILL NEED TO ASSIGN AN APPROPRIATE GENERATOR CATEGORY FOR THIS EVALUATION AND ALSO ASSESS COMPLIANCE DURING THE EPISODIC PERIOD)

11. LIST EACH CONTAINER AND TANK ACCUMULATION AREA. SPECIFY THE NUMBER AND CAPACITY OF EACH TANK AND CONTAINER TYPE. [NOTE: INCLUDE ANY SATELLITE ACCUMULATION AREAS AND VERIFY COMPLIANCE WITH SATELLITE ACCUMULATION REQUIREMENTS; IF NON-COMPLIANCE, PROVIDE COMMENT] SA=SATELLITE ACCUMULATION AREA ; AA=<180 OR <90 DAY ACCUMULATION AREA

<u>LOCATION</u>	<u>NUMBER &amp; SIZE OF CONTAINERS</u>	<u>NUMBER &amp; SIZE OF TANKS</u>
<b>BUILDING A</b>		
SA @CHROME PLATING	2 @ 55-GAL	
AA @ REAR OF BLDG	1 @ 55-GAL (HAZARDOUS)	1 @ 1,500 GAL
	1@ 55-GAL (NON-HAZ ANTIFREEZE)	
	6@ 55-GAL (NON-HAZ USED OIL)	
<b>BUILDING B</b>		
AA	1 @ 55-GAL (HAZARDOUS)	0
SA @ ETCH ROOM	1 @ 55-GAL	0
AA @ TANK ROOM [TANK #7]	0	1 @ GAL3,500
SA @ DEVELOPING ROOM	1 @ 55-GAL	0

12. COMMENTS

- \* Scrap metal taken to Cycle Systems
- \* Biennial report was submitted on 2/27/02 for the 2001 calendar year. A copy was provided to DEQ-WCRO during the inspection.
- \* Fluorescent light bulbs and batteries are managed under universal waste regulations. Please refer to #9 above.

4. FOR THE EVALUATION PERIOD COVERED BY THIS INSPECTION:
- |    |   |     |    |
|----|---|-----|----|
| A) | HAS THE FACILITY GENERATED >1 KG/MO OF ACUTE HAZARDOUS WASTE (P-LIST)   | YES | NO |
| B) | HAS FACILITY GENERATED >100 KG ACUTE HAZARDOUS WASTE FROM SPILL CLEAN-UP RESIDUE?   | YES | NO |
| C) | HAS THE FACILITY ACCUMULATED HAZARDOUS WASTE IN EXCESS OF TIME AND QUANTITY LIMITS ESTABLISHED FOR THEIR GENERATOR CLASS? [NOTE: A CESQG MAY NOT ACCUMULATE MORE THAN 1000 KG, A SQG MAY NOT ACCUMULATE MORE THAN 6000 KG OR ACCUMULATE MORE THAN 180 DAYS (OR 270 DAYS), AND A GENERATOR MAY NOT ACCUMULATE FOR MORE THAN 90 DAYS] | YES | NO |
| D) | HAS THE FACILITY <u>EPISODICALLY</u> GENERATED HAZARDOUS WASTE IN EXCESS OF THEIR NORMAL GENERATOR CATEGORY? [NOTE: APPLICABLE GENERATOR CATEGORY REQUIREMENTS APPLY DURING THE PERIOD OF GENERATION AND FOR AS LONG AS THE WASTE REMAINS ON SITE].   | YES | NO |

PROVIDE COMMENTS [IF APPLICABLE] FOR QUESTION 10 EVALUATION CATEGORY ASSIGNMENT.

5. HOW IS THE WASTE PRESENTLY BEING HANDLED? WHERE IS IT SENT? (LIST ALL TRANSPORTERS, FACILITIES, ON-SITE TREATMENT PERFORMED).

<u>TRANSPORTER</u>	<u>DISPOSAL FACILITY</u>	<u>ON-SITE TREATMENT</u>
VOPAK [VAD0031111416]	POLLUTION CONTROL INDUSTRIES [IND000646943]	N/A
FREEHOLD CARTAGE [NJD054126164]	FISHER INDUSTRIAL SERVICES [ALD981020894]	N/A
FREEHOLD CARTAGE [NJD054126164]	MICHIGAN DISPOSAL WASTE TREATMENT PLANT [MID000724831]	N/A
FREEHOLD CARTAGE [NJD054126164]	CHAMBER WORKS [E] DUPONT WASTEWATER TREATMENT PLANT]	N/A

6. DOES THE FACILITY GENERATE ANY HAZARDOUS WASTE THAT IS EXCLUDED FROM REGULATION? (E.G., RECLAIMED ON-SITE, USED AS A SUBSTITUTE FOR A CCP, DECHARACTERIZED BY TREATMENT, ETC.). IF YES, LIST THE WASTE AND THE BASIS FOR EXCLUSION.

*Wastewater is generated from various processes. They are accumulated in on-site above ground tanks and are neutralized. The waste water is pumped and taken to permitted wastewater treatment plant regulated under the Clean Water Act.*

## 7. USED OIL MANAGEMENT:

- |    |   |                              |               |     |     |
|----|---|------------------------------|---------------|-----|-----|
| A) | DOES THE FACILITY GENERATE USED OIL?  | ON SPECIFICATION <u>ONLY</u> | <u>X</u>      | YES | NO  |
|    |   | OFF-SPEC/ON-SPEC             | <u>      </u> |     |     |
|    |   | NONE                         | <u>      </u> |     |     |
| B) | DOES THE FACILITY <b>TRANSPORT</b> USED OIL ?(NOTIFICATION REQUIRED)  |                              |               | YES | NO  |
| C) | DOES THE FACILITY <b>MARKET OR BURN</b> <u>OFF-SPECIFICATION</u> USED OIL?                                  |                              |               | YES | NO  |
| D) | DOES THE FACILITY BURN USED OIL IN AN ON-SITE SPACE HEATER?<br>[VERIFY COMPLIANCE REQUIREMENTS AND COMMENT] |                              |               | YES | NO  |
| E) | DOES THE FACILITY <b>MIX</b> HAZARDOUS WASTE WITH USED OIL?   |                              |               | YES | NO  |
|    | [IF <u>YES</u> , IS THIS ON-SITE CESQG HW?]   |                              |               |     | N/A |
|    | IS THIS IGNITIBLE ONLY HW?  |                              |               |     | N/A |
|    | [FOR ANY MIXING, PROVIDE <u>COMMENT</u> AND EVALUATE PART 279 COMPLIANCE]                                   |                              |               |     |     |
| F) | DOES THE FACILITY ENSURE <b>DELIVERY</b> OF USED OIL TO A LEGITIMATE USED OIL RECLAIMER?                    |                              |               | YES | N/A |
| G) | USED OIL FILTERS:   |                              |               |     |     |
|    | DOES THE GENERATOR MANAGE USED OIL FILTERS?   |                              |               | YES | NO  |
|    | DOES GENERATOR MANAGE THESE UNDER THE FILTER EXCLUSION OF PART 261.4(B)(13)?                                |                              |               | YES | N/A |
|    | ARE FILTERS MANAGED IN SUCH A MANNER TO MEET THE CONDITIONS OF EXCLUSION?                                   |                              |               | YES | NO  |

SPECIFY MANAGEMENT METHOD(S) FOR ABOVE USED OIL QUESTIONS:

*This facility generates on-spec used oil picked up and recycled by Necessary Oil. Used filters are drained at least 24 hours, containerized, and picked up by Necessary Oil.*

- \* ***All containers used to accumulated waste in the <90 day accumulation area are DOT approved drums and are kept closed at all times, meeting any applicable Subpart CC requirements.***
  - \* ***Waste determination has been performed on waste streams. Copies of analytical data available for review.***
  - \* ***Facility has made pollution prevention advancements by utilizing chemical replacements, rendering some previous hazardous wastes streams non-hazardous. This has reduced the amount of hazardous waste generated. Facility has also replaced all organic based solvents to non-organic substitutes.***
- 

13. WASTE MANAGEMENT FLOW DIAGRAM:

[Sketch a brief, but detailed, flow diagram that includes waste generation processes, any treatment processes, the steps through accumulation/storage and off-site management, including satellite accumulation. Consider all waste streams, including any excluded hazardous wastes. Include any wastewater treatment units or facilities that may receive either on-site or hard-piped hazardous wastes, and verify permits under the CWA].

THIS SECTION IS OPTIONAL, BUT SHOULD BE VIEWED AS CRITICAL TO UNDERSTANDING COMPLEX PROCESSES OR TREATMENTS, WASTE CHARACTERIZATION ISSUES, APPLICABLE EXEMPTIONS/EXCLUSIONS, AND IS REQUIRED TO SUPPORT ANY ACTIONS WHICH MAY RESULT IN ENFORCEMENT.

***\* Please refer to previous inspection reports. Process has not changed \****

## GENERATORS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	<b>SECTION A – MANIFEST</b>				
262.20	1. Does generator ship waste off-site?	X			
262.20	2. Does generator use manifest?	X			
	a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month?) NOTE: SQGs are only exempt if wastes are reclaimed. (See 262.20(e).)			X	
	1. If yes, does generator indicate when sending waste to TSD facility?	X			
Part 262 Appendix	b. If yes, does manifest include the following information?				
	1. Manifest document no.	X			
	2. Generator's name, mailing address, telephone no.	X			
	3. Generator EPA I.D. no.	X			
	4. Transporter Name(s) and EPA I.D. no.(s)	X			
	5. Facility name, address, and EPA I.D. no.	X			
	6. Alternate facility name, address, and EPA I.D. no.	X			
	7. Instructions to return to generator if undeliverable	X			
	8. Waste information required by DOT – shipping name, quantity weight or vol., containers (type and number)	X			
	9. Emergency information (opt) (special handling instructions, phone #)	X			
	10. Is the following certification on each manifest form? "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable national and international regulations"	X			
262.40	11. Does generator retain copies of manifests? If yes, complete a through g. (262.23)	X			
	a. Did generator sign and date all manifests?	X			
	b. Did generator obtain handwritten signature and date of acceptance from initial transporter?	X			
262.40	c. Does generator retain one copy of manifest signed by generator and initial transporter?	X			
262.40	d. Do returned copies of manifest include facility owner/operator signature and date of acceptance?	X			
262.42	12. Have manifests been received from TSD facility for any waste shipped over 45 days ago?	X			
	a. If no, has the generator filed an exception report?			X	
	b. Does the exception report include:				
	1. a legible copy of the manifest for which the generator does not have confirmation of delivery?			X	
	2. a cover letter explaining the efforts taken to locate the shipment?			X	
262.11	<b>SECTION B – HAZARDOUS WASTE DETERMINATION</b>				
	3. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)	X			
	4. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, TC)?	X			
	a. Does generator determine characteristics by testing or by applying knowledge of processes?			BOTH	
	1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)?	X			
262.11	5. Has generator evaluated all solid wastes to determine whether the solid wastes are hazardous wastes?	X			
	<b>SECTION C – PRETRANSPORT REQUIREMENTS</b>				
262.30	6. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)?	X			
	a. Are containers to be shipped leaking or corroding?		X		
	b. Complete <b>Checklist 4. Containers</b> to evaluate condition of containers.				
	c. Is there evidence of heat generation from incompatible wastes in containers?		X		
262.31	7. Does generator follow DOT labeling requirements in accordance with 49 CFR 172?	X			
262.32	8. Does generator mark each package in accordance with 49 CFR 172?	X			
262.32	9. Is each container of 110 gallons or less marked with the following label? HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact nearest police or public safety authority or the USEPA.	X			
	a. Generator name(s) and address(es)	X			
	b. Manifest document No.	X			

40 CFR CITATION	REGULATION	YES	NO	NA	NC
262.33	10. Does generator have placards to offer to transporters?	X			
262.34	11. Accumulation time				
	a. Are containers used to temporarily store waste before transport?	X			
262.34(a)(2)	1. If yes, is each container clearly dated.	X			
262.34(a)(3)	2. If yes, is each container labeled/clearly marked with the words "Hazardous Waste?"	X			
262.34(c)(1)	12. Does the generator have satellite accumulation areas where up to 55 gallons of any one type of hazardous waste (HW) (1qt acutely HW) are accumulated? If yes,	X			
262.34(c)(1)(ii)	a. Are containers marked with words "Hazardous Waste" or other words that identify contents of the container?	X			
262.34(c)(1)	13. Are amounts in excess of those allowed being accumulated in satellite accumulation area? If yes,		X		
	a. Has generator marked the excess amount with the date the excess amount that began accumulating? And			X	
	b. Has the generator either removed the excess amount within three days of the date of excess accumulation or has the generator complied with all other provisions for accumulation areas. Namely, has the generator notified the Executive Director about location of accumulation area?			X	
262.40	<b>SECTION D - RECORDKEEPING AND RECORDS</b>				
	14. Does generator keep the following reports for 3 years?				
	a. Manifest or signed copies from designated facilities	X			
	b. Biennial reports	X			
	c. Exception reports	X			
	d. Test results	X			
	16. Where are the records kept (at facility or elsewhere)?				AT FACILITY
	<b>SECTION E - SPECIAL CONDITIONS</b>				
	17. Has primary exporter received from/transported to a foreign source any hazardous waste?		X		
262.53	a. If yes, has he filed a notice with the Regional Administrator?			X	
262.54	b. Is this waste manifested and signed by a foreign consignee?			X	
262.54	c. If generator transported wastes out of country, has he received confirmation of delivered shipment?			X	
268	<b>SECTION F - LDR REQUIREMENTS</b>				
	18. Does the facility <b>generate</b> , transport, <i>treat</i> , store or dispose any land-restricted wastes?	X			
	19. Is land disposal of wastes occurring? If yes,		X		
	a. Has facility been granted an extension to effective date for land restriction applicable to its restricted waste? OR			X	
	b. Has facility been granted an exemption from prohibition pursuant to a petition for those land restricted wastes and units covered by the petition? OR			X	
	c. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X	
268.5	22. Has the owner/operator submitted an application for case-by-case extension to effective date of any Applicable restriction?			X	
268.6	23. Has owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?			X	
268.3	24. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X		
268.4	25. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X		
	26. If yes, complete <b>Check Sheet 12. Surface Impoundments.</b>				
	27. Is facility treating waste in Tanks or Containers in order to meet applicable treatment standards under 268.40?		X		
268.7(a)(4)	28. If Yes, has the facility developed a Waste Analysis Plan?			X	
268.7(a)(4)(ii)	29. Has Waste Analysis Plan been filed with the Director a minimum of 30 days prior to the treatment activity?			X	
268.7(a)(1)	30. Restricted wastes, which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?			X	
	31. Did the notification include the following information:				
268.7(a)(1)(i)	a. EPA Hazardous Waste Number?			X	

40 CFR CITATION	REGULATION	YES	NO	NA	NC
268.7(a)(1)(ii)	b. Waste constituents that treater will monitor, if monitoring will not include all regulated constituents			X	
268.7(a)(1)(iii)	c. The manifest number associated with the shipment of waste? and			X	
268.7(a)(1)(v)	d. Waste analysis data, where available?			X	
268.7(a)(2)	32. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions set forth in 268.32 or RCRA section 3004(d)?			X	
	33. Did the notification include the following information:				
268.7 (a)(2)(i)(A)	a. EPA Hazardous Waste Number?			X	
268.7 (a)(2)(i)(B)	b. Waste constituents that the treater will monitor, if monitoring will not include all regulated constituents?			X	
268.7 (a)(2)(i)(C)	c. The manifest number associated with the shipment of waste? And			X	
268.7 (a)(2)(i)(D)	d. Waste analysis date, where available?			X	
268.7(a) (2)(ii)	34. Was the certification signed by an authorized representative, and did it state the following:  "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X	
268.7(a)(3)	35. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?			X	
268.7(a)(7)	36. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	X			
	37. Is the generator storing land restricted waste? (For one year storage only)		X		
	38. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			X	

COMMENTS:

- \* **Manifest requirements were in compliance.**
- \* **Containers were in good condition and marked as required.**
- \* **The facility has included required land disposal restriction forms with proper notifications.**



## HEALTH &amp; SAFETY CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/265.16(a)(1)	<b>SECTION A - OUTLINE OF PERSONNEL TRAINING PROGRAM</b>				
	1. Does the facility have a written training program?	X			
264/5.16(c)&(d)(3)	2. Does the program consist of:				
	a. strictly classroom instruction?		X		
	b. strictly on-the-job training?		X		
	c. classroom instruction AND on-the-job training?	X			
	3. Is an annual refresher course required for personnel whose positions at the facility are related to hazardous waste management?	X			
264/265.16(d)(1) and (2)	<b>SECTION B - JOB TITLE/JOB DESCRIPTION</b>				
	4. Is a job title provided for each employee whose position is related to hazardous waste management?	X			
	5. Is a job description provided for each employee whose position at the facility is related to hazardous waste management?	X			
264/265.16(a)(2)	<b>SECTION C - TRAINING DIRECTOR</b>				
	6. Is the training program directed by a person trained in hazardous waste management?	X			
264/265.16(a)(2)	<b>SECTION D - RELEVANCE OF TRAINING TO JOB POSITION</b>				
	7. Are facility personnel instructed in hazardous waste management procedures (including contingency plan implementation) relevant to their positions?	X			
264/265.16(a)(3)	<b>SECTION E - TRAINING AND EMERGENCY RESPONSE</b>				
	8. Does training program include the following emergency response procedures <b>as applicable</b> ?				
	a. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment?	X			
	b. Key parameters for automatic waste feed cutoff systems?	X			
	c. Procedures for utilizing communications/alarm systems?	X			
	d. Directions for responding to fires or explosions?	X			
	e. Procedures for groundwater contamination response?	X			
	f. Procedures for conducting shutdown operations?	X			
264/265.16(b), (d)(4) and (3)	<b>SECTION F - IMPLEMENTATION OF TRAINING PROGRAM</b>				
	9. Are all facility personnel trained within six months of their employment or assignment to the facility or transfer to a new position?	X			
	10. Are facility personnel allowed to work unsupervised before their training program has been completed?		X		
	11. Are records maintained which document that the required training has been given to and completed by facility personnel?	X			
264/265.33	<b>SECTION G - TESTING AND MAINTENANCE OF EQUIPMENT</b>				
	12. Does the owner/operator test and maintain (as necessary to assure its proper operation in time of emergency) the following equipment:				
	a. All communications or alarm systems?	X			
	b. Fire protection equipment?	X			
	c. Spill control equipment?	X			
	d. Decontamination equipment?	X			
264/265.15	<b>SECTION H - GENERAL INSPECTION REQUIREMENTS (PERMITTED FACILITIES ONLY)</b>				
	13. Does the owner/operator maintain a written schedule at the facility for the inspection of:				
	a. Monitoring equipment?			X	
	b. Safety and emergency equipment?			X	
	c. Security devices?			X	
	d. Operating and structural equipment?			X	
	e. Types of problems with equipment:			X	
	1. Malfunction			X	
	2. Operator error			X	
	3. Discharges			X	
	14. Does the schedule identify types of problems to look for?			X	
	15. Is frequency of inspection based on possible deterioration of equipment and probability of incident?			X	

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	16. Are areas subject to spills, such as loading and unloading areas, inspected daily?			X	
	17. Does the owner/operator maintain an inspection log? If yes, does the log include:			X	
	a. Date and time of inspection?			X	
	b. Name of inspector?			X	
	c. Notations of observations?			X	
	d. Date and nature of repairs or remedial actions?			X	
	18. Have any malfunctions or other problems not been remedied? (note in COMMENTS)			X	
264/265.35	<b>SECTION I - REQUIRED AISLE SPACE</b>				
	19. Does the facility maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?	X			
	20. If aisle space is not maintained, has the owner/operator demonstrated to the Regional Administrator that the space is not needed?			X	
264/265.32	<b>SECTION J - EQUIPMENT REQUIREMENTS</b>				
	21. Is there evidence of fire, explosion, or contamination of environment? If yes, explain in COMMENTS		X		
	22. Is the facility equipped with the following:				
	a. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel?	X			
	b. A device such as a telephone (immediately available) or handheld two-way radio capable of summoning emergency assistance from police, fire, or state or local emergency response teams?	X			
	c. Portable fire extinguishers?	X			
	d. Fire control equipment (including special extinguishing equipment such as foam, inert gas, or dry chemical)?	X			
	e. Spill control equipment?	X			
	f. Decontamination equipment?	X			
	g. Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	X			
264/265.17(a) & (b)	<b>SECTION K - REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES (PERMITTED FACILITIES ONLY)</b>				
	23. Does the facility handle ignitable or reactive waste? If yes:			X	
	a. Does the owner/operator take the following precautions to prevent accidental ignition or reaction of wastes: Separate and protect ignitable or reactive wastes from sources of ignition or reaction (open flames, smoking, cutting, welding, hot surfaces, frictional heat, static electrical/ mechanical sparks, spontaneous ignition, radiant heat)?			X	
	24. Does the owner/operator confine smoking and open flames to specially designated locations, while ignitable or reactive waste is being handled?			X	
	25. Are "No Smoking" signs placed conspicuously wherever there is a hazard from ignitable or reactive waste?			X	
	26. Does owner/operator have procedures in place to prevent accidental ignition or reaction of wastes?			X	
264/265.50 through 265.56	<b>SECTION L - CONTINGENCY PLAN</b>				
	27. Does owner/operator have a Contingency Plan, or a Spill Prevention Control and Counter measures (SPCC) Plan, or some other emergency plan, that is amended for hazardous waste management?	X			
	28. Is a copy maintained at the facility?	X			
	29. Has a copy been submitted to all local police and fire departments, hospitals, and State and local emergency response teams?	X			
	30. Does plan describe control procedures taken in event of a fire, explosion, or release?	X			
	31. Does the plan describe how and when it will be implemented?	X			
	32. Does the plan describe arrangements agreed to by local police and fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	X			
	33. Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
	34. Is one person named as the primary coordinator?	X			
	35. Does the coordinator have the authority to commit the resources to carry out the plan?	X			
	36. Does plan physically describe and identify location of all emergency equipment?	X			
	37. Does the plan include provisions to ensure that the equipment is cleaned and fit for its intended use before operations are resumed?	X			
	38. Does plan include an evacuation plan for facility personnel?	X			

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	39. Does the plan describe:				
	a. Signal(s) to be used to begin evacuation?	X			
	b. Evacuation routes?	X			
	c. Does the plan describe the methodology for immediate notification of:	X			
	1. Facility personnel?	X			
	2. State/ local agencies w/designated response roles?	X			
	40. Does the plan include procedures for identification of released materials?	X			
	41. Does plan include procedures/criteria to assess possible hazards to human health and environment that may result from the release, fire, or explosion?	X			
	42. Does plan describe all reasonable measures necessary to ensure that fires, explosions, or releases do not occur, reoccur, or spread to other hazardous waste at the facility?	X			
	43. Does plan describe procedures to monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment if facility stops operation in response to a fire, explosion, or release?	X			
264/265.37	<b>SECTION M - NECESSARY AGREEMENTS WITH LOCAL AUTHORITIES</b>				
	44. Has the owner/operator made the following arrangements:				
	a. Familiarized police, fire departments, and emergency response teams with the layout of the facility and associated hazards?	X			
	b. Designated one police and fire department with primary emergency authority when more than one might respond?	X			
	c. Agreements with State emergency response teams, contracts, equipment suppliers?	X			
	d. Familiarized local hospitals with the properties of waste handled at the facility and the types of injuries or illness that could result?	X			
	45. Where authorities decline to enter into such arrangements, has the owner/operator documented the refusal?			X	

**COMMENTS:**

**TRAINING:** *Training performed and documented as required. Commendable safety and training programs.*

**CONTINGENCY PLAN:** *The facility has a contingency plan that meets the requirements.*

**INSPECTION REQUIREMENTS:** *All inspections were performed and documented as required.*

## 4. CONTAINERS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	<b>SECTION A - USE AND MANAGEMENT</b>				
264/265.171	1. Are containers in good condition?	X			
	<b>SECTION B - COMPATIBILITY OF WASTE WITH CONTAINER</b>				
264/265.172	2. Is container made of a material that will not react with the waste which it stores?	X			
	<b>SECTION C - MANAGEMENT OF CONTAINERS</b>				
264/265.173(a)	3. Is container always closed while holding hazardous waste?	X			
264/265.173(b)	4. Is container not opened, handled, or stored in a manner, which may rupture it or cause it to leak?	X			
	<b>SECTION D - INSPECTIONS</b>				
264/265.174	5. Does owner/operator inspect containers at least weekly for leaks and deterioration?	X			
	<b>SECTION E - IGNITABLE AND REACTIVE WASTES</b>				
264/265.176	6. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines?	X			
	<b>PERMITTED FACILITIES ONLY</b>				
	<b>SECTION F - INCOMPATIBLE WASTE</b>				
264/265.177(a)	7. Are incompatible wastes or materials placed in the same containers?			X	
264/265.177(b)	8. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?			X	
264/265.177(c)	9. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?			X	
	<b>SECTION G - CLOSURE</b>				
	10. Do container storage areas have a containment system?	X			
264/265.178	11. At closure, were all hazardous wastes and associated residues removed from the containment system?			X	

COMMENTS:

*All containers were in good condition.*

## 18. TANKS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	1. Which of the following describes the tank(s) employed at this facility?  a. Indoor – not on permeable floor b. Indoor – on permeable floor c. Outdoor – above ground d. Outdoor – in ground e. Outdoor – underground	THREE INDOOR TANKS  BLDG A: 1 @ 1,500 GAL  BLDG B: 1 @ 2,000 GAL 1 @ 3,500 GAL [FOR HAZ WASTE]			
265.191	2. Does the tank(s) appear to be in good condition? (If no, describe in the Comments.)	X			
265.193	3. Is the tank(s) provided with an effective secondary containment system? (If yes, describe in Comments.)	X			
265.191(a)	a. If no, does the facility have a written assessment reviewed and certified by an independent, qualified, registered professional engineer that attests to the tank(s)'s structural integrity?			X	
265.191(b)	4. Was a leak test performed on the tank(s)?	X			
265.194(b)	5. Is the tank(s) provided with adequate controls to prevent spills or overflows (i.e. automatic feed cutoff, by pass to another unit, high level alarms, etc.)	X			
265.194(b)	6. Is there sufficient freeboard (2 feet) in uncovered tank(s) to prevent overtopping by wave or wind action or precipitation?			X	
265.195(a)	7. Is tank(s) inspected each operating day?	X			
265.195(a)(1)	If yes, do inspections include: a. Overfill/spill control equipment?	X			
265.195(a)(2)	b. Above ground portions of the tank(s) for corrosion or releases?	X			
265.195(a)(3)	c. Data gathered from monitoring equipment and leak detection equipment?	X			
265.195(a)(4)	d. Area immediately surrounding the externally accessible portion of the tank(s) and secondary containment system for signs of erosion and releases?	X			
265.195(b)(4)	8. Does the facility perform annual inspections of the cathodic protection system, if present?	x			
265.195(c)	9. Does the facility properly document all of the results of its tank system inspections?	X			
265.196	10. Is there any indication that the facility did not properly respond to spills or leaks from a tank(s) (this would include failure to stop the spill/leak, failure to clean up spilled/leaked material, failure to minimize migration, failure to remove tank(s) from service immediately, failure to provide notification, etc.)? If yes, describe in Comments.		X		
	11. Does the facility store any ignitable or reactive waste in its tanks(s)?		X		
265.198(a)(1)	a. Is the waste treated, rendered or mixed before or immediately after placement in the tank(s) so that it no longer meets the definition of ignitable or reactive waste?			X	
265.198(a)(2)	b. Is the waste stored in such a way that it is protected from any material or condition that may cause the waste to ignite or react?			X	
265.198(a)(3)	c. Is the tank(s) used solely for emergencies?			X	
265.198(b)	d. Does the tank(s) appear to be a safe distance from the facility's property line and public thoroughfares? If no, describe			X	

TANKS  
CHECKLIST

ROTOMETRICS  
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40 CFR CITATION	REGULATION	YES	NO	NA	NC
	in the Comments.				
	12. Is there any indication that incompatible wastes are being stored in a tank(s)?		X		
265.199(a)	If yes: a. Is there any evidence of extreme heat or pressure, fire or toxic emissions occurred? If yes, describe in Comments.			X	
265.200	13. Are waste analysis conducted or written documentation obtained before placing a substantially different hazardous waste into a tank(s)?			X	

COMMENTS:

\* TANK ACCUMULATION AREAS/DESCRIPTIONS:

LOCATION	TANK #	CAPACITY	TYPE WASTE	CONTAINMENT
BLDG A @ < 90 DAY ACCUM AREA	N/A	1,500 GALLONS	WASTE CORROSIVE LIQUID D002 D007 D009 F006	DOUBLE WALLED TANK
BLDG B IN	10	1,000 GALLONS	WASTE ETCH RINSE SOLIDS D002 D007 F006	SUB FLOOR; ROOM IS CONTAINED
TANK ROOM	7	3,500 GAL	WASTE FERRIC CHLORIDE SOLUTION D002 D007 D008 F006	SUB FLOOR; ROOM IS CONTAINED

*Tanks are equipped with high level alarms and shut off valves*